

U.S. BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
FILED

JUN 22 2016

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI****DANNY L. MILLER, CLERK**
BY NW **DEPUTY CLERK****IN RE: SLABBED NEW MEDIA, LLC**
Debtor**CHAPTER 11**
CASE NO. 15-50963**MOTION RE: NAMES AND ADDRESSES INCORRECTLY
ENTERED BY DEBTOR AND FOR ADDITIONAL TIME
UNDER RULE 2002(P)**

Purported Creditors Charles Leary and Vaughn Perret both have foreign addresses and have had Canadian addresses throughout this proceeding. These creditors have never received proper notice at any stage of this proceeding. In addition, Debtor has always listed "Charles Leary, Vaughn Perret, and Trout Point Lodge" as if this was a single person owed a single debt and with a single foreign address. This is incorrect, as was always known to Debtor and his attorneys.

Now, seemingly in response to an objection filed, Debtor has reportedly added Charles Leary and Vaughn Perret as individual purported creditors, but has knowingly incorrectly listed them with United States addresses. In addition, Debtor has not removed the false entity "Charles Leary, Vaughn Perret, and Trout Point Lodge" from the list of creditors.

Charles Leary is a physical person; Vaughn Perret is a physical person. Charles Leary and Vaughn Perret hereby designate as their address for purposes of receiving notice in this bankruptcy proceeding only: 140 Trout Point Road, E. Kemptville, Nova Scotia B5A 5X9, Canada.

No notice has ever been correctly and properly served on Charles Leary & Vaughn Perret during this proceeding, and these purported creditors do not waive any rights past or present prejudiced by Debtor's failure to give proper notice. Under 11 U.S. Code § 342, "Notice provided to a creditor by the debtor or the court other than in accordance with this section (excluding this subsection) shall not be effective notice until such notice is brought to the attention of such creditor."

In addition, under Bankruptcy Rule 2002(p), Charles Leary and Vaughn Perret hereby aver that a notice mailed within the time prescribed by the Bankruptcy Rules will not be sufficient to give them, as creditors with a foreign address to which notices under the Bankruptcy Rules are mailed, reasonable notice; we respectfully request additional time or a modified means of notice in accordance with that rule. In our estimation it can take up to twenty days for regular mail from Mississippi to reach Yarmouth County, Nova Scotia, Canada.

Finally, Charles Leary will be filing a request for an audio recording of the June hearing where Debtor testified, Form MSSB-436-1 (12/15), and will need time to receive the recording and review it in detail before filing any objection or response to Debtor's Second Amended Disclosure Statement. Apparently, payment for the recording has to be sent by cheque or money order, which will entail additional delay.

Respectfully submitted this ____ day of June, 2016.



Charles L. Leary



Vaughn Perret

140 Trout Point Road

E. Kemptville, NS B5A 5X9 CANADA